



Searles Valley Minerals

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August 5, 2011

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814

Searles Valley Minerals provides the following comment regarding the proposed 15-Day Modifications for the California Cap On Greenhouse Gas Emissions and Market-Based Compliance Mechanisms regulation:

Table 9-1 in the proposed modifications references NAICS Code 212391, Potash, Soda and Borate Mineral Mining. This U.S. industry comprises establishments primarily engaged in developing the mine site, mining and/or milling, or otherwise beneficiating (i.e., preparing) natural potassium, sodium, or boron compounds. Dry lake brine operations are included in this industry, as well as establishments engaged in producing the specified minerals from underground and open pit mines.

- In Table 9-1 the following change for NAICS Code 21239 Benchmark Units would more accurately reflect the product mix for the compounds designated on the Code and for this type of operation in California:
Benchmark Units – Allowances / Short Ton of Soda Ash Equivalent (Soda Ash, Biocarb, Borax, V-Bor, DECA, PYROBOR, Boric Acid, Sodium Sulfate, Potassium Sulfate, Potassium Chloride and Sodium Chloride.

Searles Valley Minerals appreciates the opportunity to comment on the proposed modifications.

Sincerely,

Ross H. May
Director, Environmental
Searles Valley Minerals